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*Attorneys for Defendants
Paula Petersen and Mark Petersen*

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

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| In re ROCKWELL DEBT FREE PROPERTIES, INC., Debtor. | Bankruptcy No. 20-25326 (KRA) Chapter 7 Honorable Kevin R. Anderson |
| STEVEN R. BAILEY, Chapter 7 Trustee, Plaintiff, v. PAULA PETERSEN and MARK PETERSEN, Defendant. | ANSWER |

**ANSWER OF DEFENDANTS PAULA PETERSEN AND MARK PETERSEN TO
PLAINTIFF'S COMPLAINT**

Defendants Paula Petersen and Mark Petersen, by their undersigned counsel, answers
Plaintiff's complaint ("Complaint") as follows:

JURIDICTION, VENUE, AND PARTIES

1. Lack information and therefore deny.
2. Lack information and therefore deny.
3. Lack information and therefore deny.
4. Lack information and therefore deny.
5. Lack information and therefore deny.
6. Deny.
7. Admit.
8. Deny.

FACTUAL ALLEGATIONS

9. Deny that Defendants were insiders; Lack information and therefore deny remaining allegations.
10. Deny that Defendants were insiders; Lack information and therefore deny remaining allegations.
11. Deny.
12. No numbered paragraph identified as #11 in the Complaint.

FIRST CLAIM FOR RELIEF
(11 U.S.C. § 548—Fraudulent Transfer)

13. Incorporate prior responses.
14. No response is required to this statement of law.
15. No response is required to this statement of law.
16. No response is required to this statement of law.
17. No response is required to this statement of law.

18. Deny.

19. Deny.

20. Deny.

21. Deny.

22. Deny.

SECOND CLAIM FOR RELIEF

(11 U.S.C. §§ 550 & 551—Transferee Liability and Preservation)

23. Incorporate prior responses.

24. Deny.

25. Deny.

26. Deny.

THIRD CLAIM FOR RELIEF

(11 U.S.C. § 542—Turnover)

27. Incorporate prior responses.

28. Deny.

29. Deny.

30. Deny.

FOURTH CLAIM FOR RELIEF

(11 U.S.C. § 502(d)—Disallowance of Claims)

31. Incorporate prior responses.

32. Deny.

REQUEST FOR RELIEF

Deny all Request for Relief.

GENERAL DENIAL

Deny any allegation not expressly admitted.

DEFENSES

Without admitting any of the allegations in the Complaint, Defendants asserts the following defenses, affirmative or otherwise, without assuming the burden of proof that it would not otherwise have. In addition to the defenses described below, Defendants expressly reserves its right to amend its answer and allege additional defenses, affirmative or otherwise, as additional information becomes available and/or is otherwise discovered through the course of discovery.

**FIRST DEFENSE
(Failure to State a Claim)**

The Complaint fails to state a claim upon which relief can be granted.

**SECOND DEFENSE
(Statute of Limitations)**

The plaintiff's claim is barred by the statute of limitations.

**THIRD DEFENSE
(Equivalent Value)**

The Plaintiff's claim is barred because the Debtor received reasonably equivalent value for the monies he transferred to the Defendants from the services the Defendants provided to the Debtor.

**FOURTH DEFENSE
(Solvency)**

The Plaintiff's claim is barred because the Debtor was solvent at the time of the transfer to the Defendants.

**FIFTH DEFENSE
(Look-Back Period)**

The Plaintiff's claim is barred because the transfer occurred outside of the two-year look-back period.

WHEREFORE, Defendants Paula Petersen and Mark Petersen respectfully request that the Court:

- A. Enter judgment in Defendants' favor dismissing the Complaint with prejudice.
- B. Award Defendants their reasonable costs and fees, including attorneys' fees.
- C. Grant Defendants such other and further relief as the Court deems just and proper.

JURY DEMAND

Defendants Paula Petersen and Mark Petersen demand a trial by jury on all issues triable by a jury.

DATED this 6th day of October 2023.

Respectfully submitted,

KUNZLER BEAN & ADAMSON

/s/ Chad S. Pehrson
Chad S. Pehrson
Marcia Fuller Durkin
Attorneys for Defendants
Paula Petersen and Mark Petersen

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on October 6, 2023, I electronically filed the foregoing **ANSWER OF DEFENDANTS PAULS PETERSEN AND MARK PETERSEN TO PLAINTIFF’S COMPLAINT** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

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/s/ Chad S. Pehrson